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November 30, 2022

Via ECF

Hon. Barbara Moses
United States District Court
Southern District of New York
Daniel P. Moynihan United States Courthouse
500 Pearl Street, Room 740
New York, NY 10007

Re: Fashion Leaf Garment Co. Ltd. et al. v. Ringerjeans LLC et al.
Civil Action No. 1:19-CV-03381-AC
Status Report and Request for Extension of Deadlines

Dear Magistrate Moses:

As attorney for the Defendants in the above referenced matter, I respectfully submit this letter on behalf of all counsel to advise the Court of the current status of the case, and to request an extension of certain case deadlines. All discovery has been completed. Pursuant to Stipulation and Order entered November 28, 2022, Anhui filed an amended complaint, to which my clients' deadline to answer is December 12, 2022. I anticipate no problems filing the answer prior to that date.

The deadline for filing of a summary judgment motion has also been fixed at December 12, 2022. Anhui and the Defendants have exchanged meaningful settlement proposals, and a revised settlement proposal is expected from the original Plaintiffs in the next day or so. In light of our progress, we respectfully request that the summary judgment deadline be extended for thirty (30) days to see if settlements can be concluded without having to incur additional legal fees. We also request that the status conference currently scheduled for December 6, 2022 be adjourned until early January, 2023.

On behalf of all parties, we thank Your Honor for your consideration of the foregoing.

Respectfully yours,

/s/ J. Ted Donovan

cc: Charles Wizenfeld, Esq. (via ECF)
Michael Cassell, Esq. (via ECF)